

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant,

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Chapter 7 Estate  
of Bernard L. Madoff,

Plaintiff,

v.

BANQUE INTERNATIONALE À LUXEMBOURG  
S.A. (*f/k/a* Dexia Banque Internationale à  
Luxembourg S.A.); RBC INVESTOR SERVICES  
BANK S.A. (*f/k/a* RBC Dexia Investor Services Bank  
S.A.); RBC INVESTOR SERVICES TRUST (*f/k/a*  
RBC Dexia Investor Services Trust); BANCO  
INVERDIS, S.A., as successor in interest to RBC  
Dexia Investor Services España S.A.; and BANQUE  
INTERNATIONALE À LUXEMBOURG (SUISSE)  
S.A. (*f/k/a* Dexia Private Bank (Switzerland) Ltd.),

Defendants.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation  
(Substantively Consolidated)

Adv. Pro. No. 12-01698 (CGM)

**STIPULATION AND ORDER  
TO EXTEND INITIAL DISCLOSURE DEADLINE**

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC, under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the estate of Bernard L. Madoff, under Chapter 7 of the United States Bankruptcy Code, 11 U.S.C. §§ 701-784, and defendants Banque

Internationale à Luxembourg S.A. (*f/k/a* Dexia Banque Internationale à Luxembourg S.A.), Banque Internationale à Luxembourg (Suisse) S.A. (*f/k/a* Dexia Private Bank (Switzerland) Ltd.), RBC Investor Services Bank S.A. (*f/k/a* RBC Dexia Investor Services Bank S.A.), RBC Investor Services Trust (*f/k/a* RBC Dexia Investor Services Trust), and Banco Inversis, S.A. (as successor in interest to RBC Dexia Investor Services España S.A.) (collectively, “Defendants,” and together with the Trustee, the “Parties”), by and through their respective undersigned counsel, stipulate and agree as follows:

**WHEREAS**, on June 30, 2023, the United States Bankruptcy Court for the Southern District of New York entered a Case Management Plan in this action, which required that the Parties serve initial disclosures on or before August 29, 2023 (the “Initial Disclosure Deadline”) (ECF No. 191); and

**WHEREAS**, the Parties have conferred and agreed to extend the Initial Disclosure Deadline.

**IT IS HEREBY STIPULATED AND AGREED**, by the Parties, and **SO ORDERED**, by the Court:

1. The Initial Disclosure Deadline shall be extended to September 12, 2023.
2. The Parties otherwise reserve all rights, arguments, objections, and defenses they may have, and their entry into this stipulation shall not impair or otherwise affect any such rights, arguments, objections, and defenses.

*[Signatures on following page]*

Dated: August 24, 2023  
New York, New York

/s/ Howard L. Simon  
**Windels Marx Lane & Mittendorf, LLP**

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Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Chapter 7  
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*Attorney for Defendants RBC Investor Services  
Bank S.A., RBC Investor Services Trust, and  
Banco Inversis, S.A. (as successor in interest to  
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à Luxembourg S.A. (f/k/a Dexia Banque  
Internationale à Luxembourg S.A.) and Banque  
Internationale à Luxembourg (Suisse) S.A.  
(f/k/a Dexia Private Bank (Switzerland) Ltd.)*

**SO ORDERED.**

**Dated: August 24, 2023  
Poughkeepsie, New York**



/s/ Cecelia G. Morris  
**Hon. Cecelia G. Morris  
U.S. Bankruptcy Judge**